

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MARGERITA NOLAND-MOORE)	CASE NO. 1:18-cv-02730
)	
)	JUDGE ADAMS
Plaintiff,)	
v.)	<u>JOINT MOTION FOR EXTENSION</u>
CITY OF CLEVELAND)	<u>OF TIME UNTIL FEBRUARY 6, 2020</u>
)	<u>TO SUBMIT MOTION FOR</u>
)	<u>APPROVAL</u>
Defendant.)	
)	

The Parties jointly and respectfully move for an extension of time to submit class action settlement papers requesting preliminary settlement approval to the Court. (ECF #29). The Parties have come to an agreement on all material terms of final settlement; however, the Parties have jointly decided to expand the class to include former employees. Defendant requires up to thirty (30) days to do the calculations to determine the new class composition and updated settlement cost. As a result, the parties respectfully request a deadline of February 6, 2020 to submit the motion for approval and settlement papers to the Court. This request is made in good faith and not for the purposes of delay, but rather to allow the Parties an opportunity to resolve the final class composition in this settlement involving over one thousand individual putative class members.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was filed electronically.

Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

s/ Ryan A. Winters
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